

EXHIBIT A

36443

**CIRCUIT COURT OF COOK COUNTY
COUNTY DEPARTMENT, LAW DIVISION**

LIONEL H. BROWN,

Plaintiff,

V.

MID-WEST TRUCK PARTS &
SUPPLIER, LLC and
JEFFREY A. HATFIELD, JR.,

Defendants.

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COMPLAINT

Plaintiff, Lionel H. Brown, complains of Defendants Mid-west Truck Parts & Supplier, LLC, and Jeffrey A. Hatfield, Jr., and states as follows:

The Parties

1. The Plaintiff, Lionel H. Brown, resides at 18329 West St., Lansing, IL, Cook County.
2. Defendant, Mid-west Truck Parts & Supplier, LLC, a Kentucky LLC, is a truck supply company that has or had its principal office located at 1410 10th St. Tell City, IN 47586.
3. Defendant, Jeffrey A. Hatfield, Jr., was the driver of the Mid-west Truck-owned vehicle involved in the crash with the Plaintiff. He resides at 1670 Tick Ridge Road, Hanesville, KY 42348. On information and belief, at the time of the accident he was employed by Mid-west Truck and traveling on company business.

Venue

4. Venue is proper in this county pursuant to 735 ILCS 5/2-101 because all defendants are residents of other states, and the Plaintiff resides in and was treated in Cook County.

COUNT I – NEGLIGENCE BY JEFFREY A. HATFIELD, JR.

5. Plaintiff incorporates paragraphs 1-4 by reference. This count is brought by Plaintiff against Defendant Jeffrey A. Hatfield, Jr.

6. On May 9, 2014, Plaintiff was traveling eastbound in the right lane on Lincoln Avenue in Charleston, Illinois when he stopped at, or was slowing down for, a red light at the intersection of West Lincoln Avenue and University Drive. There were two cars between Brown and the red light, both of which were also either stopped or slowing down for the red light.

7. On May 9, 2014, defendant Hatfield was the driver of a truck also travelling eastbound in the right lane on Lincoln Avenue behind Plaintiff's car. When the light turned red, Defendant failed to reduce his speed, and his truck collided with the back end of Plaintiff's car with sufficient force to drive Plaintiff's car into the car in front of his, which was in turn forced into the car closest to the intersection.

8. On May 9, 2014, defendant Hatfield had a duty to operate his vehicle in a reasonably safe and appropriate manner and in accordance with all applicable traffic safety laws.

9. Notwithstanding that duty, defendant Hatfield was negligent in one or more of the following ways:

- a. Failed to decrease his speed to attempt to avoid colliding with the Plaintiff's vehicle, in violation of 625 ILCS 5/12-201;
- b. Operated his vehicle without keeping a proper lookout;
- c. Operated his vehicle at a speed that was greater than reasonable and proper with regard to traffic conditions and use of the roadway, in violation of 625 ILCS 5/12-601; and
- d. Otherwise failed to operate his vehicle in a reasonably safe and appropriate manner.

10. As a direct and proximate result of one or more of the foregoing negligent acts or omissions by defendant Hatfield, the vehicle that Plaintiff was driving was violently struck, causing him to be injured, incur medical bills, suffer physical pain and distress, and suffer interference with his normal daily activities.

WHEREFORE, Plaintiff asks for judgment against defendant Jeffrey A. Hatfield, Jr.

COUNT II – NEGLIGENCE BY MID-WEST TRUCK PARTS & SUPPLIES, INC.

11. Plaintiff incorporates paragraphs 1-10 by reference. This count is brought by the Plaintiff against Defendant Mid-west Truck Parts & Supplier, LLC, Brown's employer.

12. As a direct and proximate result of one or more of the foregoing negligent acts or omissions by defendant Hatfield, the vehicle which Plaintiff Brown was driving was violently struck, causing him to be injured, incur medical bills, suffer physical pain and distress, and suffer interference with his normal daily activities. Mid-west Truck owned the vehicle and employed Hatfield.

13. On May 9, 2014, at the time of the car crash at issue, Hatfield was driving during his work day and within the scope of his employment.

14. As Hatfield's employer, Mid-west Truck is responsible for his actions taken while he was acting within the scope of his employment.

WHEREFORE, Plaintiff asks for judgment against defendant Mid-west Truck Parts & Supplier, Inc.

Respectfully Submitted,

Adam Goodman



One of Plaintiff's attorneys

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AFFIDAVIT OF DAMAGES PURSUANT TO SUPREME COURT RULE 222

The undersigned, being first duly sworn upon his oath, deposes and states that he is one of the attorneys representing the Plaintiff in the above entitled cause of action seeking money damages or collection of taxes and states that this cause of action does exceed \$50,000.00.

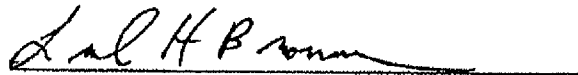
By:



One of the attorneys for Plaintiffs

Furthermore, the Plaintiff in this cause also affirm that the total amount of money damages sought in this complaint, exclusive of costs, exceeds \$50,000.00.

By:



Lionel Brown

Adam Goodman

~~GABRIEL HARDY~~

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